

# **EXHIBIT 2**

DIRECT TESTIMONY OF  
EDWARD CAPUTO

CHECKLIST ITEM 7

January 28, 2002

**PUC Docket No. P-421/CI-01-1370**  
OAH Docket No. 12-2500-14485-2

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Edward Caputo and my business address is 601 South 12<sup>th</sup> Street,  
3 Arlington, Virginia, 22202.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am Director of Operator and Directory Services for MCImetro Access  
6 Transmission Services, L.L.P. ("MCIIm"). I have held management positions in  
7 the telecommunications field for the past 11 years. Prior to that I held  
8 management positions in the Information Technology and Finance field. I have  
9 had management responsibilities at MCIIm and its predecessor entity, MCI, since  
10 1990 in the area of Operator and Directory Services.

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 A. The purpose of this declaration is to refute QWEST'S position in its 271  
13 Application that it has met its obligation to provide nondiscriminatory access to  
14 directory assistance services and operator call completion services to CLECs as  
15 required under Checklist Item 7. QWEST does not recognize its obligation to  
16 offer OS and DA Services as UNEs until such time as it **provides** customized  
17 routing which will allow MCIIm to route MCIIm's customers OS and DA calls to  
18 MCIIm's UNE-P OS/DA platform.

19 MCIIm's preferred method of customized routing requires QWEST to route  
20 MCIIm UNE-P customers' OS and DA traffic, over shared-access Feature Group  
21 D trunks, to MCIIm's own OS and DA platform. This will enable MCIIm to offer its  
22 own OS and DA services to its own customers. Until such time as QWEST  
23 provides customized routing to MCIIm in the manner that meets MCIIm's needs

and FCC rules, QWEST must provide OS and DA services to MCIm as UNEs.

Because QWEST does not provide customized routing, QWEST must offer OS and DA as UNE's. Because QWEST does not offer OS and DA as UNEs in its proposed ICA language it does not provide nondiscriminatory access to network elements as prescribed in item 7 of the 271 checklist.

**Q. PLEASE EXPLAIN WHAT OPERATOR SERVICES AND DIRECTORY ASSISTANCE SERVICES ARE.**

A. Operator Services ("OS") and Directory Assistance ("DA") are services that support operator call completion and the ability of MCIm to provide directory assistance services to its customers. Operator Services refer to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call. Specifically, ILECs must allow telephone service customers to connect to the operator services offered by that customer's chosen local service provider by dialing "0" ("0-") or "0" plus the desired telephone number ("0+"), regardless of the identity of the customer's local telephone service provider.

Directory Assistance refers to a service in which users are provided with telephone numbers and, in some instances, addresses of individual telephone exchange service subscribers. The information provided to users is obtained from databases that contain the names, addresses, and telephone numbers of the telephone exchange service subscribers within particular geographic areas that do not elect to have unpublished numbers.

**Q. WHAT OPTIONS ARE AVAILABLE TO MCIM TO PROVIDE OS AND DA SERVICES TO ITS CUSTOMERS?**

1 A. In order to provide OS and DA services to its customers, MCIm can either  
2 purchase OS/DA from QWEST or provide its own OS/DA. The only way MCIm  
3 can effectively provide its own OS/DA to its customers is through access to the  
4 local switched network.<sup>1</sup> Since QWEST owns and controls the network, it  
5 controls access to the telephone customer. In order to provision its own OS/DA,  
6 MCIm is dependent on QWEST to route MCIm's customers' OS/DA calls to  
7 MCIm's UNE platform.

8 **Q. WHICH OF THESE TWO METHODS DOES MCIM PREFER?**

9 A. MCIm prefers custom routing to purchasing QWEST's OS/DA for a variety of  
10 reasons. First, this will promote competition in the local telephone market in  
11 Minnesota. It will allow MCIm to provide service to residential, as well as small  
12 business, local customers. One of the considerations that MCIm must make  
13 when determining whether to enter local market competition is the cost of  
14 providing service and the resulting probability that it will be able to compete  
15 profitably. QWEST's price for its OS is approximately four times more expensive  
16 than MCIm's cost to perform the same function with MCIm's operators. In its  
17 price list, Exhibit A to this 271 filing, QWEST lists a wholesale price of \$0.028 per  
18 operator work second for Local Operator Service. QWEST'S price for Local  
19 Directory Assistance of \$0.35 per a call is approximately one-third more  
20 expensive than MCIm's cost to perform this same function with MCIm operators.

---

<sup>1</sup> The only alternative to customized routing that would enable MCIm to provide its own OS/DA would be for MCIm to lay its own network of dedicated trunks throughout QWEST's territory. Not only would this alternative be prohibitively costly, duplicative and a waste of MCIm's resources, it would circumvent the entire unbundling concept set forth in the Act upon which competitive access to the local market is based. The only viable option is to deliver those OS/DA calls to MCIm's UNE platform through customized routing.

1 QWEST has also sought to assess MCIIm charges for trunking, and branding.

2 MCIIm can avoid these charges by self-provisioning OS and DA services. All of  
3 these factors are severe drags on profitability and have delayed MCIIm's entry  
4 into the local consumer and small business markets in Minnesota. MCIIm has a  
5 responsibility to its shareholders to invest in products and services, which will  
6 provide a positive return. This results in positive cash flow and growth in  
7 capitalization, which can be used for additional investment.

8 Second, self-provisioning will allow MCIIm to directly control OS/DA  
9 service offerings to its customers. This will enable MCIIm to develop and deploy  
10 new and innovative services. The FCC recognizes the importance of these  
11 services to CLECs:

12 "As the Commission explained in the *Local Competition First*  
13 *Report and Order*, using unbundled network elements and resold  
14 services present different opportunities, risks, and costs, in  
15 connection with providing local telephone service. These  
16 differences influence the entry strategies of potential competitors.  
17 The Commission stated that carriers using unbundled elements will  
18 have greater opportunities to offer services that are different from  
19 those services offered by the incumbents." *UNE Remand Order* at  
20 68.

21  
22 The FCC also stated:

23  
24 "Two fundamental goals of the Act are to open the local exchange  
25 and exchange access markets to competition and to promote  
26 innovation and investment by all participants in the  
27 telecommunications marketplace. To further the goal of opening  
28 the local market to competition, we may consider how access to  
29 specific unbundled network elements will encourage the rapid  
30 introduction of local competition to the benefit of the greatest  
31 number of consumers." *UNE Remand Order* at 103.

32  
33 Third, self-provisioning will enable MCIIm to offer ubiquitous OS/DA  
34 services to its customers. Today, MCIIm provides extensive operator and

1 directory services to its local facilities based customers, long distance customers  
2 and provides OS/DA services to non-subscribers with products such as 1-800-  
3 COLLECT. MCIm strives to enhance its brand image by delivering feature  
4 consistency as well as reliable high quality with respect to automated and live  
5 operator handling. MCIm prefers to control product content and delivery in all  
6 markets in which it participates in order to protect the value and image of its  
7 brand.

8 Finally, MCIm wants the opportunity to compete with QWEST as a  
9 provider of OS/DA services to other CLECs in Minnesota. In order to do so,  
10 other CLECs will need QWEST to provide the customized routing to direct  
11 CLECs' customers' calls to MCIm's OS/DA platform.

12 **Q. DOES MCIM BELIEVE THAT QWEST'S PROPOSAL WITH RESPECT TO**  
13 **CUSTOMER ROUTING IS ADEQUATE?**  
14

15 **A.** No. MCIm has communicated its requirements to QWEST in my Testimony filed  
16 in May 16, 2001 in a cost proceedings in Arizona (Docket No: T-00000A-00-  
17 0194) and my Testimony filed in June 27, 2001 in a Colorado cost proceeding  
18 (Docket No. 99A-577T). QWEST has not proven that it can provide a workable  
19 version of customized routing to MCIm for MCIm's OS/DA calls. MCIm requires  
20 that QWEST route MCIm's OS/DA traffic to existing, shared access, Feature  
21 Group D trunks between QWEST's local network and MCIm's long distance  
22 network. Feature Group D trunks are industry-standard trunks that were put into  
23 place shortly after divestiture to allow competitive long distance carriers to  
24 provide services to customers. It is clearly technically feasible for a CLEC such  
25 as MCIm to use the industry-standard Feature Group D functionalities to route

OS/DA traffic to its facilities-based OS/DA platform.<sup>2</sup> While QWEST's proposed language in Minnesota suggests that it would make customized routing available to MCI via Line Class Codes and switch routing capabilities, there is no indication that QWEST can actually provide the type of customized routing MCI needs. And, QWEST requires that MCI order and establish separate dedicated trunks if MCI, or any CLEC, wants to use any method of customized routing that is not identical to what QWEST uses for its' own customers.

**Q. DOES QWEST'S PROPOSAL MEET THE REQUIREMENTS OF THE  
FEDERAL TELECOMMUNICATIONS ACT?**

A. No. As discussed below, it is MCI's position that QWEST's proposal is not consistent with its obligations under the Act and the FCC's *UNE Remand Order*.

MCI's request for customized routing through Feature Group D-based Line Class Codes is consistent with the FCC's rules associated with OS/DA UNEs and customized routing. In its *UNE Remand Order*, the FCC provides the following definition of customized routing:

Customized routing permits requesting carriers to designate the particular outgoing trunks associated with unbundled switching provided by the incumbent, which will carry certain classes of traffic originating from the requesting provider's customers. This feature would allow the requesting carrier to specify that OS/DA traffic from its customers be routed over designated trunks which terminate at the requesting carrier's OS/DA platform or a third party's OS/DA platform.<sup>3</sup>

---

<sup>2</sup> WorldCom is proposing an industry standard Feature Group D configuration that relies on the commonly-used SS7 protocol. QWEST, on the other hand, has insisted that anything other than QWEST Line Class Codes identical to QWESTs would be ICB Priced even though the functionality of the Line Class Codes and switch routing is essentially the same.

<sup>3</sup> *UNE Remand Order* ¶ 441 n.867.



MCIm's Feature Group D proposal is clearly technically feasible and would allow WorldCom to "designate the particular outgoing trunks associated with unbundled switching provided by the incumbent" and "designate the particular outgoing trunks associated with unbundled switching provided by the incumbent."

**Q. HAS MCIM PROPOSED AN ALTERNATIVE APPROACH?**

A. Yes. MCIm has developed an engineering proposal that uses the same type of Line Class Code and existing local switch features, and functionality as QWEST uses, which meets WorldCom's customized routing needs. MCIm has offered to provide QWEST with the documentation for this proposal in both the Arizona and Colorado proceedings but QWEST has not accepted MCIm's offer. MCIm's proposal requires QWEST to route MCIm's OS/DA traffic using line class codes and other switch software features to shared access, FGD trunks to MCIm's long distance network. QWEST's switch will translate each MCIm's customers' 411, 555-1212 call into a 10-digit number that QWEST will route like any other long-distance call it sends to MCIm's Long Distance, FGD trunks. Similar methods will be used to change the nature of MCIm customers' 0+ and 0- calls to route them to MCIm's Long Distance network. MCIm has requested that QWEST perform all switching functions and translations necessary to support this routing. QWEST will then send these MCIm calls, along with all other MCIm long-distance (customer-originated 1+ calls where the MCIm customer is PIC'd to MCIm) to MCIm's existing FGD trunks.

**Q. HAS MCIM DONE ANYTHING TO TEST THE TECHNICAL FEASIBILITY OF ITS PROPOSAL?**

1 A. Yes. MCIIm engineers have conclusively tested MCIIm's customized routing  
2 request using switches from Nortel, Lucent and Siemens that MCIIm has in our  
3 own laboratories. MCIIm engineers researched the documentation that these  
4 vendors supply to determine whether capabilities exist within these switches to  
5 support customized routing. They began this research and testing process on  
6 October 10, 2000 and completed it the first week of January 2001. As a result of  
7 these tests, MCIIm proved conclusively that it is technically feasible to perform  
8 customized routing using FGD signaling with the necessary translations, as  
9 MCIIm has informed QWEST.

10 MCIIm engineers were confident that their tests would be successful  
11 because MCIIm has performed customized routing to support delivery of Local,  
12 Facilities Based Customers' Directory Assistance traffic to MCIIm's own operator  
13 platform using FGD signaling on both Nortel and Siemens local switches since  
14 September 1997. Lucent 7RE and 5ESS local switches have had the capability  
15 to route directory and operator assisted calls along two distinctly different routing  
16 paths since the 5E12 software release. This release was available fourth-quarter  
17 1997, through feature SFID 269, also known as 99-CP-4031. Nortel provides  
18 this capability through routing tables in their switches.<sup>4</sup> Siemens provides  
19 additional capabilities in this regard as described in Bulletin 99PB-06 issued  
20 March 1999, called "Overview of EWSD Unbundling and Interconnection features  
21 in support of the Multi-Service Provider Environment." MCIIm's test of  
22 customized routing utilizes these switch features and functions.

1 **Q. DO YOU AGREE WITH QWEST'S CLAIM THAT IT PROVIDES CUSTOMER**  
2 **ROUTING TO CLECS?**

3 A. No. QWEST's claim that it provides customized routing to CLECs is false. The  
4 routing options QWEST describes in its proposed ICA, Section 9.12 requires  
5 MCIIm to order and establish dedicated trunks in order to route MCIIm's OS and  
6 DA calls to MCIIm's UNE-P OS/DA platform, and are of no use to MCIIm.  
7 MCIIm's requested routing uses standard line class code and switch routing  
8 functionality, and there is no reason QWEST can not implement it in a swift,  
9 efficient and businesslike manner. MCIIm's request simply requires QWEST to  
10 treat the OS and DA calls like any other MCIIm long-distance calls and route them  
11 over MCIIm's designated, shared-access FGD trunks.

12 QWEST's cookie-cutter options for "customized" routing, set forth in  
13 QWEST's proposed ICA Section 9.12, conflict squarely with the FCC's  
14 requirements. The FCC's *UNE Remand Order* specifies that the requesting  
15 CLEC designates the trunks to which the ILEC must route the OS/DA traffic:

16 "Customized routing permits requesting carriers to designate the particular  
17 outgoing trunks associated with unbundled switching provided by the  
18 incumbent, which will carry certain classes of traffic originating from the  
19 requesting provider's customers. This feature would allow the requesting  
20 carrier to specify that OS/DA traffic from its customers be routed over  
21 designated trunks which terminate at the requesting carrier's OS/DA  
22 platform or a third party's OS/DA platform."<sup>5</sup>  
23

24 According to the FCC's definition of customized routing, it is MCIIm, and  
25 not QWEST, who is entitled to designate the trunks to which QWEST will route

---

<sup>4</sup> MCIIm will require access to QWEST's switch routing tables to specify customized routing in Nortel switches. The FCC ordered ILECs to provide requesting CLECs with this access in its *UNE Remand Order* at 251-252.

<sup>5</sup> *UNE Remand Order* ¶ 441 n.867.

1 MCI's OS/DA traffic. QWEST has no right to designate that MCI establish  
2 separate trunks.

3 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

4 A. In summary, QWEST does not provide customized routing to CLECs, including  
5 MCI and as such does not provide nondiscriminatory access to directory  
6 assistance services and operator call completion services as required. The  
7 Commission should order QWEST immediately to comply with its obligation to  
8 provide nondiscriminatory access to, directory assistance services and operator  
9 call completion services and until QWEST does it should not be deemed to meet  
10 the requirement under checklist Item 7 of section 271.

11 **Q. DOES THAT COMPLETE YOUR TESTIMONY?**

12  
13 A. Yes, it does.  
14  
15  
16  
17  
18  
19